

**EXHIBIT B**

**Rule 2016 Statement**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

YELLOW CORPORATION, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 23-11069 (CTG)

(Jointly Administered)

**STATEMENT UNDER RULE 2016 OF THE FEDERAL RULES OF  
BANKRUPTCY PROCEDURE AND SECTION 329 OF THE BANKRUPTCY CODE**

1. Kasowitz Benson Torres LLP (the “Firm”), pursuant to Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and section 329 of title 11 of the United States Code (the “Bankruptcy Code”), hereby makes this statement in support of the *Debtors’ Application Pursuant to Sections 327(e), 328(a), and 330 of the Bankruptcy Code for Entry of an Order Authorizing the Retention and Employment of Kasowitz Benson Torres LLP, as Special Litigation Counsel to the Debtors Effective as of the Petition Date* (the “Application”), and states:<sup>2</sup>

2. The Debtors have agreed to pay the Firm for the legal services that have been or will be rendered by its various attorneys, paralegals, and case management assistants in connection with these cases on the Debtors' behalf, as set forth in the Application. The Debtors have also agreed to reimburse the Firm for its actual and necessary expenses incurred in connection with these cases, as set forth in the Application. The Firm received payment from the Debtors during the year prior to the Petition Date in the amount of \$10,808,844. As of the

<sup>1</sup> A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of the Debtors' principal place of business and the Debtors' service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

<sup>2</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Application.

Petition Date, the Firm had an outstanding invoice to the Debtors in the amount of \$1,323,987. The prepetition arrears were the direct result of the significant legal work arising out of and necessitated by the events described in the IBT Action and related to fees incurred in the month prior to the commencement of the chapter 11 cases.

3. The Firm will seek approval of payment of compensation for postpetition services upon the filing of appropriate applications for allowance of interim or final compensation pursuant the Bankruptcy Code, the Bankruptcy Rules, the Local Rules and any other applicable orders of this Court.

4. The Firm further states that it has neither shared nor agreed to share (a) any compensation it has received or may receive with another party or person, other than with the members, of counsel, and associates of the Firm, or (b) any compensation another person or party has received or may receive.

Dated: September 7, 2023

KASOWITZ BENSON TORRES LLP

/s/ Marc E. Kasowitz

Marc E. Kasowitz

Partner

*Proposed Special Litigation Counsel to the Debtors*